

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

In re: Kenneth and Catherine Owensby	}	Case No: 15-10985
Debtor(s)	}	
	}	Chapter 13
	}	
	}	Judge W.H. Drake, Jr.

NOTICE OF HEARING

Creditors are hereby notified that a hearing will take place on **Thursday, May 28, 2015**, at 9:20 a.m. at the second floor courtroom, Federal Building, 18 Greenville, Street, Newnan, GA 30263, to consider the **Motion to Extend Automatic Stay as to All Creditors** filed by the Debtors in this case. Any objection may be filed with the Bankruptcy Clerk at the above-referenced address with service made on the Debtor(s), Debtor(s)øattorney, and on the Chapter 13 Trustee.

Dated this May 18, 2015.

/s/ Gina Karrh
Gina Karrh, Ga. Bar No: 408378
H. Brooks Cotten., P.C.
5 Jackson Street
Newnan, GA 30263
(770) 683-3303

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

IN RE:	Kenneth and Catherine Owensby	:	Case No.: 15-10985
		:	
	Debtors	:	Chapter 13
		:	

**MOTION TO EXTEND STAY AS TO ALL CREDITORS
PURSUANT TO 11 USC § 362(C)(3)**

COME NOW, Kenneth and Catherine Owensby, the Debtors in the above-styled case and through counsel files this Motion to Extend Stay Pursuant to 11 USC § 362(c)(3) and show the Court as follows:

1.

The Debtors filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code, on or about May 5, 2015, being case number 15-10985.

2.

The Debtors filed a previous Chapter 13 case on or about June 5, 2014, Case Number 14-11248. Said case was dismissed on or about May 1, 2015 after confirmation for failure to make plan payments. Therefore, the Debtors have been in a previous case within 1 year of the filing of the instant case.

3.

The Debtors suffered unanticipated vehicle failure and had to spend the Chapter 13 plan payments on car repairs. Therefore, the Debtors could not pay the Chapter 13 plan payments.

4.

Subsequent to the dismissal of the prior case, circumstances have changed as follows: The cars are repaired and the Debtors now know about Motions to Suspend plan payments that are available for these emergency situations. The Debtors are working steadily and the plan is feasible as the proposed plan payment can be paid.

WHEREFORE, Debtor prays:

1. This Motion be read and considered;
2. A hearing be scheduled,
3. The Stay be extended pending further Order of this Court as to all creditors; and
4. Any other relief as may be just and proper

Respectfully submitted this May 18, 2015.

/s/ Gina Karrh

Gina Karrh, Bar # 408378

H. Brooks Cotten, Bar # 189545

5 Jackson St.

Newnan, GA 30263

770/683-3303

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing pleading and the Notice of Hearing upon the Trustee and all other entities affected thereby, including all creditors of record in this case or in the prior case, with service also on any attorney who has filed a Notice of Appearance in either case, by depositing same in U.S. Mail in properly addressed envelope(s) with sufficient postage affixed thereto and correctly addressed as follows:

Adam M. Goodman
Chapter 13 Trustee
260 Peachtree Street, Suite 200
Atlanta, GA 30303

Department of Justice
Tax Division
Attn: Chief, Civil Trial Section, Southern Region
P.O. Box 14198
Ben Franklin Station
Washington, DC 20044

Internal Revenue Service
Insolvency Unit
401 W. Peachtree Street, NW
Stop 335-D
Atlanta, GA 30308

Internal Revenue Service
PO Box 21126
Philadelphia, PA 19114

David Delduco
Special Assistant
United States Attorney
401 W. Peachtree Street
Suite 1400
Stop 100-D
Atlanta, GA 30308

US Attorney
Northern District of Georgia
Civil Division, Attn: Civil Clerk
600 Richard Russell Building
75 Spring Street, NW
Atlanta, GA 30303

United States Attorney General
Main Justice Building
10th and Constitution Ave. NW
Washington, DC 20530

ALL CREDITORS AND ATTORNEYS/PARTIES ON ATTACHED MATRIXES

This May 18, 2015.

/s/ Gina Karrh
Gina Karrh, Bar#408378
H. Brooks Cotten, P.C.
5 Jackson St.
Newnan, GA 30263
770/683-3303

Amcol Systems, Inc.
for Medical Payment Data
111 Lancewood Road
Columbia, SC 29210

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Calvary Portfolio Service
for Cap One
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Capital One Bank
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Richmond, VA 23285

Cavalry SPV I, LLC
for Capital One Bank
500 Summit Lake Dr, Ste 400
Valhalla, NY 10595

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Tuscaloosa, AL 35401

Cedar Rock Outdoors
12261 White House Pkwy
Woodbury, GA 30293

Cerastes, LLC
c/o Weinstein, Pinson and Rile
2001 Western Ave, Ste 400
Seattle, WA 98121

Classic Finance of Roanoke
c/o Joe Lett, owner
1133 Main Street
Roanoke, AL 36274

Classic Finance of Roanoke
c/o Joe Lett, owner
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Roanoke, AL 36274

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Columbus Consolidated Parking
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Credit Management LP
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Ed Davis
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Financial Asset Management
for Medical Payment Data
P.O. Box 451409
Atlanta, GA 31145

First Premier Bank
P.O. Box 5524
Sioux Falls, SD 57117-5524

First Premier Bank
P.O. Box 5524
Sioux Falls, SD 57117-5524

First Premier Bank
601 S. Minnesota Avenue
Sioux Falls, SD 57104

Franklin Collection Service
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P.O. Box 3910
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GoldCar Lending-Gils Auto
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Phenix City, AL 36870

GoldCar Lending-Gils Auto
3962 U SHwy 80 WBld A
Phenix City, AL 36870

Holloway Credit Solutions
for Medical Payment Data
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Montgomery, AL 36123-5609

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P.O. Box 230609
Montgomery, AL 36123-5609

Jefferson Capital Systems
P.O. Box 7999
Saint Cloud, MN 56302

Lagrange Loans
c/o Cora Pleasant, B.Manager
900 Hogansville Road, Ste A
Lagrange, GA 30241

Lagrange Loans
c/o Cora Pleasant, B.Manager
900 Hogansville Road, Ste A
Lagrange, GA 30241

Lake Carroll Auto Sales
909 Bankhead Highway
Carrollton, GA 30117

MBC
for Medical Payment Data
11701 Belcher Rd S Ste 1
Largo, FL 33773

Medical Payment Data
Medical Payment Data
2001 9th Ave., Ste 312
Vero Beach, FL 32963-6413

Merrick Bank
c/o Resurgent Capital Services
PO Box 10368
Greenville, SC 29603

Portfolio Recovery Associates
Attn: Delores Garcia
P.O. Box 41067
Norfolk, VA 23541

Premier Bankcard/Charter
POB2208
Vacaville, CA 95696

Quantum3 Group LLC
CP Medical LLC
P.O. Box 788
Kirkland, WA 98083-0788

Region/AMS
P.O. Box 11007
Birmingham, AL 35288

Security Finance
c/o Kerri Williams, br mgr
127 Commerce Ave. Suite C1
Lagrange, GA 30240

Security Finance
c/o Amanda Haney, Manager
159 Temple Avenue, Ste E
Newnan, GA 30263

SFC Central BK & Recovery
PO Box 1893
Spartanburg, SC 29304-1893

Sprint
Attn: Bankruptcy Dept
P.O. Box 7949
Cincinnati, OH 45274-0602

Strickland's Texaco
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The Law Offices of MIT
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The Orthopaedic Clinic
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WEBBANK/Fingerhut
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West Ga Medical Center
c/o Sandy Titus, patient svcs
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